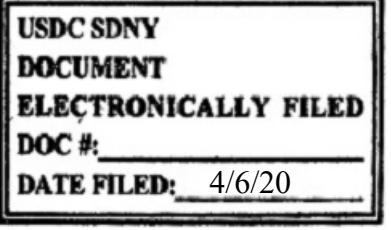


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



In re Global Brokerage, Inc. f/k/a FXCM, Inc.
Securities Litigation

Master File No. 1:17-cv-00916-RA-BCM

CLASS ACTION

**STIPULATION AND [PROPOSED]
ORDER EXTENDING THE BRIEFING
SCHEDULE FOR PLAINTIFFS'
MOTION FOR CLASS CERTIFICATION**

This Document Relates To: All Actions

This Stipulation is entered into between Lead Plaintiffs 683 Capital Partners, LP and Shipco Transport Inc., Named Plaintiff Sergey Regukh, and Movant E-Global Trade and Finance Group, Inc. (collectively, "Plaintiffs") and Defendants Global Brokerage, Inc. f/k/a FXCM, Inc., Dror Niv, and William Ahdout (collectively, "Defendants").

WHEREAS, Plaintiffs filed their Motion for Class Certification and Appointment of Class Representative and Class Counsel (the "Class Certification Motion") on January 6, 2020;

WHEREAS, Defendants' deadline to file their opposition to the Class Certification Motion is April 3, 2020, and Plaintiffs' deadline to file their reply in support of the Class Certification Motion is May 18, 2020;

WHEREAS, given the challenges resulting from the current COVID-19 pandemic, the parties require additional time to conduct discovery, including the depositions of Lead Plaintiffs;

WHEREAS, on February 28, 2020, the parties requested an extension of the deadlines related to the Class Certification Motion, which was granted by the Court on March 2, 2020;

IT IS HEREBY STIPULATED AND AGREED by the undersigned that Defendants' deadline to oppose the Class Certification Motion is extended to May 8, 2020, and Plaintiffs'

deadline to file their reply in support of their Class Certification Motion is extended to June 22, 2020.

THE ROSEN LAW FIRM, P.A.

/s/ Joshua Baker
Phillip Kim
Laurence M. Rosen
Joshua Baker
275 Madison Avenue, 40th Floor
New York, New York 10016
Telephone: (212) 686-1060
Fax: (212) 202-3827
Email: pkim@rosenlegal.com
Email: lrosen@rosenlegal.com
Email: jbaker@rosenlegal.com

Lead Counsel for Lead Plaintiffs

**WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLP**
Matthew M. Guiney, Esq. (MG 5858)
270 Madison Avenue
New York, NY 10016
Tel: (212) 545-4600
Email: guiney@whafh.com

Additional Counsel

KING & SPALDING LLP

/s/ Paul R. Bessette
Paul R. Bessette
Israel Dahan
1185 Avenue of the Americas
New York, New York 10036-2601
Tel: (212) 556.2100
Fax: (212) 556.2200

Rebecca Matsumura, *pro hac vice*
500 W. 2nd Street Suite 1800
Austin, Texas 78701
Tel: (512) 457.2000
Fax: (512) 457.2100

Attorneys for Defendants

SO ORDERED, on this 6 day of April, 2020



Barbara Moses
United States Magistrate Judge